

EXHIBIT 2
FILED UNDER SEAL

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
)
Plaintiff,)
vs.) Case No.
17-cv-00939-WHA
UBER TECHNOLOGIES, INC.;)
OTTOMOTTO, LLC; OTTO TRUCKING LLC,)
)
Defendants.)
)
)
)

HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY

UNDER THE PROTECTIVE ORDER
VIDEOTAPED DEPOSITION OF
GAETAN PENNECOT
San Francisco, California
Thursday, August 9, 2017
Volume IV

Reported by:
MARY J. GOFF
CSR No. 13427
Job No. 2675906
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1 was derived, in part, from the work that you did 02:38:29
2 previously on FAC lenses for the GBR3, such as shown 02:38:33
3 in Exhibit 533? 02:38:37

4 MR. MUINO: Objection, form. 02:38:39

5 A Would you agree? 02:38:45

6 Q (BY MR. JAFFE) Would you agree that your 02:38:46
7 work on creating the FAC lens for Fuji here in 02:38:47
8 Exhibit 105 was derived, in part, from the work you 02:38:51
9 did previously on FAC lenses for GBR3, such as those 02:38:56
10 shown in Exhibit 533? 02:39:01

11 MR. MUINO: Same objection. 02:39:04

12 A So I mean, I gained a lot of experience 02:39:05
13 with ZEONEX while at Google, so the optimization -- 02:39:08
14 yeah, like, it helped me, like, probably in the 02:39:19
15 optimization. Like, overall with ZEONEX I have been 02:39:23
16 getting much better. 02:39:27

17 Q (BY MR. JAFFE) I mean, you're not sitting 02:39:28
18 here telling me that [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] 02:39:40

22 MR. MUINO: Objection, form. 02:39:41

23 A So I mean -- [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] 02:40:01

1 [REDACTED] 02:40:05

2 [REDACTED]

3 [REDACTED] 02:40:16

4 [REDACTED]

5 [REDACTED]

6 [REDACTED] 02:40:26

7 Q (BY MR. JAFFE) All right. You're not 02:40:28

8 answering my questions. My -- my question is: 02:40:29

9 [REDACTED], is not 02:40:33

10 a coincidence, is it? 02:40:36

11 MR. MUINO: Objection, form. 02:40:38

12 A I mean, in some ways, yeah, it's -- it's 02:40:40

13 in my head. I have, like, some experience from 02:40:46

14 before, and I -- and you know -- like, you're always 02:40:49

15 impacted by your previous experience. 02:40:52

16 Q (BY MR. JAFFE) Right. So the design here 02:40:56

17 in Exhibit 105 is based, in part, on your work on 02:40:57

18 creating the G -- GBR FAC lens shown here in 02:41:02

19 Exhibit 533, right? 02:41:06

20 A So I -- 02:41:07

21 MR. MUINO: Objection, form. 02:41:07

22 A -- I used my experience. You know, like, 02:41:07

23 my previous experience is always here in my head, so 02:41:10

24 I don't know in which sense I used it or not. I -- 02:41:16

25 I don't -- was I thinking -- I don't know. 02:41:22

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1 [REDACTED] 02:41:29
2 [REDACTED] 02:41:33
3 [REDACTED]
4 [REDACTED]
5 [REDACTED] So some of it maybe, 02:41:45
6 like -- you know, my work at Google may have 02:41:48
7 impacted a little bit of my work on the FAC lens. 02:41:58
8 MR. MUINO: Jordan, I think it's been more 02:42:32
9 than an hour since our last break. Is this a good 02:42:33
10 time for a break? 02:42:37
11 MR. JAFFE: Sure. 02:42:39
12 THE VIDEOGRAPHER: Off the record at 02:42:41
13 2:42 p.m. 02:42:43
14 (A break was taken from 2:42 p.m. to 02:42:44
15 2:55 p.m.) 02:42:46
16 THE VIDEOGRAPHER: Back on the record at 02:55:12
17 2:55 p.m. 02:55:15
18 Q (BY MR. JAFFE) I'm going to mark as 02:55:18
19 Exhibit 539, a document labeled UBER 86702. 02:55:18
20 (Exhibit 539 was marked for identification 02:55:26
21 and is attached to the transcript.) 02:55:26
22 Q (BY MR. JAFFE) Mr. Pennecot, do you see I 02:55:38
23 have marked -- marked as -- Exhibit 539? 02:55:39
24 A I see. 02:55:48
25 Q This is a transmit board for the Fuji, 02:55:50